

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**NORBERTO MEDINA-RODRIGUEZ**

*Plaintiff*

**v.**

**HOLSUM DE PUERTO RICO, INC.**, doing  
business as *La Tiendita Holsum*

*Defendant*

**CASE NO. 15-cv-03190 (JAF)**

**MOTION FOR EXTENSION OF TIME TO FILE TRANSLATIONS**

**TO THE HONORABLE COURT:**

COMES NOW, Defendant Holsum de Puerto Rico, Inc. ("Holsum"), through their undersigned attorneys and without submitting itself to the jurisdiction of this Honorable Court and very respectfully alleges and prays as follows:

1. On May 19, 2016, Holsum filed a Motion to Dismiss for Failure to State a Valid Claim and Memorandum in Support Thereof. See Docket 14. Also Defendant filed a Motion for Reconsideration of Order of the authorization given to plaintiff to file their case *in forma pauperis*. See Docket 17.

2. In both of these dockets Defendant included an exhibit in the Spanish language and for which, prior to filing, requested leave to file them. See Dockets 13 & 16, respectively.

3. At this time, however, Defendant requests an extension of no less than 21 additional days in which to file the translations to both of the exhibits filed in the Spanish language found at Docket 14-2 at page 8, and Docket 17-2 at pages 1-2. Thus, for an extension until at least July 8<sup>th</sup>.

4. The aforementioned extension is not meant to cause any unjustified delay to this matter and, respectfully submit, it will not cause undue prejudice to any of the parties.

**WHEREFORE**, it is respectfully requested for this Honorable Court to grant us until July 8<sup>th</sup>, 2016 to file the certified translations to the above-referenced documents.

**I HEREBY CERTIFY**: That the foregoing motion has been filed on this same date using the CM/ECF system which will send notice of this filing to counsel of record.

**RESPECTFULLY SUBMITTED**. In Guaynabo, Puerto Rico, this 17th day of June, 2016.

**Attorneys for Defendant**

**GUILLERMO L. MENA-IRIZARRY**

USDC-DPR No. 301509

[guillermo.mena@me.com](mailto:guillermo.mena@me.com)

[guillermo75@gmail.com](mailto:guillermo75@gmail.com)

Ext. Roosevelt

559 Cabo Alverio St.

San Juan, Puerto Rico 00918

Tel. 787-347-9793

**ANTONIO VALIENTE**

Maramar Plaza – Suite 1120

101 San Patricio Avenue

Guaynabo, Puerto Rico 00968-2646

Tel. 787-620-5300

Fax 787-620-5305

By: S/ Antonio Valiente

Antonio Valiente

USDC-DPR No. 213906

[lcdoavaliente@live.com](mailto:lcdoavaliente@live.com)

[lcdoavaliente@gmail.com](mailto:lcdoavaliente@gmail.com)